



June 29, 2006

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Washington, DC 20554

**Re: MB Docket 03-15
Request for Waiver of Replication/ Maximization Interference
Protection Deadline
WSWG, Valdosta, GA (Facility ID No. 28155)
Gray Television Licensee, Inc. (FRN: 0002-7460-22)**

Dear Ms. Dortch:

On behalf of Gray Television Licensee, Inc. ("Gray"), the licensee of WSWG(TV) ("WSWG"), its attorneys submit this request for a waiver of the July 1, 2006 replication/ maximization interference protection deadline. Gray has been unable to complete construction of the digital facility for WSWG because of circumstances beyond its control. *See Second Periodic Review of the Commission's Rules and Regulations Concerning the Transition to Digital Television*, MB Docket No. 03-15, FCC 04-192, ¶¶ 78, 87 (2004). As directed by the Public Notice *DTV Channel Election Issues – Compliance with the July 1, 2006 Replication/ Maximization Interference Protection Deadline; Stations Seeking Extension of the Deadline.*, released June 14, 2006, this request for waiver is being filed electronically through the Commission's Electronic Filing System. Concurrently herewith, WSWG is submitting a request to extend its existing Special Temporary Authority ("STA") to continue to operate its digital facilities while it completes the construction of its full power, authorized digital facility.

Gray acquired WSWG just seven months ago, in November 2005, and immediately began preparing for the construction of WSWG's authorized digital facilities. Gray commissioned a tower analysis to determine if the tower upon which WSWG leased space could support the weight of the authorized digital facility. Gray's analysis showed that certain reinforcements must be made to the tower prior to installing WSWG's digital facility.

Gray submitted its tower analysis to the tower owner, Global Signal, and requested permission to begin the reinforcement work. Global Signal rejected Gray's study and insisted upon commissioning its own analysis. Despite repeated requests, Gray was not provided with a

copy of Global Signal's analysis until June 2006. Global Signal's analysis was identical in all material respects to the analysis commissioned by Gray.

In late-April, concerned about the significant delays to its construction schedule, Gray requested and finally received permission from Global Signal to move forward with the purchase of the necessary materials to reinforce the tower. Gray immediately placed an expedited order for the steel to provide vertical and horizontal bracing and replacement guy wires and scheduled a tower crew.

In early June, just weeks before Gray's tower crew was scheduled to begin work, Global Signal contacted Gray and retracted its permission for Gray to undertake the modifications to the tower. Global Signal instead arranged for its own tower crew to perform the modifications to the tower structure. Once the Global Signal's crew completes the tower modifications (replacement guy wires), Gray's tower crew will install the vertical and horizontal bracing necessary to support the digital antenna and install the digital antenna.

The Global Signal tower crew began work the week of June 19. The tower crew hired by Gray will begin work the week of July 5 and currently is scheduled to complete the installation by July 20, 2006.

While awaiting authority from the tower owner to begin the reinforcement work on the tower, Gray moved forward with those aspects of the digital construction that were within its control: the purchase of the antenna, transmitter and transmission line. This equipment arrived in March and the transmitter has since been installed.

Since its acquisition of WSWG seven months ago, Gray has worked diligently to construct WSWG's full authorized digital facilities. Those portions of the construction within Gray's control were complete by March 2006. However, the digital facility could not be completed until WSWG's tower was appropriately reinforced. This project was delayed by the tower owner, a situation beyond Gray's control. Immediately upon receiving permission to move forward with the tower reinforcement, Gray ordered the necessary material, expedited delivery and arranged for a qualified tower crew. Based upon the circumstances detailed herein, Gray respectfully submits that a waiver of the July 1, 2006 replication/ maximization deadline is appropriate.

Sincerely,



Joan Stewart

cc: Shaun Mayer, Esq., FCC, MB (via e-mail: Shaun.Maher@fcc.gov)
WSWG Local Public File